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ABSTRACT

A review by the General Accounting Office (GAO) of the Law Enforcement Assistance Administration's (LEAA) compliance efforts with the mandates of the Juvenile Justice and Delinquency Act suggests that little progress has been made. GAO recommends that LEAA: (1) catalog the overall Federal efforts to provide a meaningful basis for coordination of juvenile delinquency activities; (2) encourage additional interagency projects dealing with key youth issues; and (3) provide the National Advisory Committee and the Coordinating Council with the direction and resources to carry out their mandated responsibilities. The Office of Management and Budget should monitor LEAA's and examine whether it possesses sufficient authority to fulfill its coordination mandate. (Author)

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BY THE COMPTROLLER GENERAL

Report To The Congress

OF THE UNITED STATES

Federal Juvenile Delinquency-Related Activities: Coordination And Information Dissemination Are Lacking

Little progress has been made in implementing the coordination and information dissemination provisions of the Juvenile Justice and Delinquency Prevention Act. As suggested by the act, the Law Enforcement Assistance Administration should assume a leadership role and provide direction and guidance to delinquency-related programs.

Implementing GAO's recommendations may not entirely solve the problem because LEAA may not be able to carry out its coordination mandate. The Office of Management and Budget should closely monitor LEAA'S activities and establish a working committee to examine the issue further.

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UNITED STATES GENERAL ACCOUNTING OFFICE

GGD-79-63
AUGUST 3, 1979

COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

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To the President of the Senate and the
Speaker of the House of Representatives

This report discusses the implementation of the coordination and information dissemination provisions of the Juvenile Justice and Delinquency Prevention Act. It concludes that little progress has been made, and calls for the Law Enforcement Assistance Administration to assume the leadership role that was expected of it when the act was passed.

This review was made because of a long-term concern expressed by the Congress about the absence of coordination in Federal juvenile delinquency-related programs.

We are sending copies of this report to the Director, Office of Management and Budget, and the Attorney General.

Comptroller General
of the United States

COMPTROLLER GENERAL'S REPORT TO THE CONGRESS

FEDERAL JUVENILE DELINQUENCY-RELATED ACTIVITIES: COORDINATION AND INFORMATION DISSEMINATION ARE LACKING

D I G E S T

In developing the Juvenile Justice and Delinquency Prevention Act of 1974, the Congress cited a lack of effective program coordination as one of the major weaknesses of Federal juvenile delinquency prevention efforts. Accordingly, it established a new office within the Law Enforcement Assistance Administration (LEAA) to serve as the focal point for all Federal juvenile delinquency activities and to improve overall coordination of related programs.

After reviewing what LEAA has done to implement the coordination and information dissemination provisions of that legislation, GAO concluded that not much progress has been made.

--LEAA's annual reports have been of little value in providing a comprehensive picture of the Federal juvenile delinquency effort. (See pp. 5 to 8.)

--LEAA funded few interagency projects. (See pp. 8 to 10.)

--The National Advisory Committee for Juvenile Justice and Delinquency Prevention--a committee established by the act--has had little impact on Federal juvenile delinquency program policies or priorities. (See pp. 10 to 14.)

--The Coordinating Council, the primary Federal coordinating body established under the act, has not met regularly as required and has not received adequate staff support. (See pp. 14 to 17.)

Although the act gave LEAA responsibility for providing useful information about the treatment and control of juvenile offenders, GAO found that such information is still lacking.

Moreover, GAO proposed that plans to develop a separate juvenile justice informational

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clearinghouse be reassessed to see whether existing ones could be used. LEAA is taking action in this area. (See ch. 3.)

RECOMMENDATIONS

The Attorney General should direct LEAA to assume the leadership role that was expected of it when the Juvenile Justice and Delinquency Prevention Act was passed. It should

--catalog the overall Federal efforts to provide a meaningful basis for coordination,

--encourage additional interagency projects dealing with key youth issues, and

--provide the National Advisory Committee and the Coordinating Council with the direction and resources necessary to carry out their mandated responsibilities.

Implementing GAO's recommendations may not entirely solve the coordination problem because there are questions which still need to be answered. One such question is whether LEAA possesses sufficient authority to carry out its coordination mandate.

The Director, Office of Management and Budget (OMB), should closely monitor LEAA efforts to coordinate Federal juvenile delinquency programs and establish a working committee to further examine the coordination issue. This committee would be chaired by OMB and consist of representatives of that Office and involved Federal agencies. (See p. 32.)

AGENCY COMMENTS

OMB and the Department of Justice gave recognition to the coordination problems noted in GAO's report and discussed actions, both underway and planned, to achieve improvements. (See app. I.)

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ABBREVIATIONS

GAO	General Accounting Office
HEW	Department of Health, Education, and Welfare
LEAA	Law Enforcement Assistance Administration
OJJDP	Office of Juvenile Justice and Delinquency Prevention

CHAPTER 1

INTRODUCTION

The Juvenile Justice and Delinquency Prevention Act of 1974 (Public Law 93-415) renewed the Federal commitment to provide leadership in the fight against juvenile delinquency. It also created a new framework for coordinating Federal resources.

In developing the 1974 act, the Congress found that one of the major weaknesses of Federal juvenile delinquency prevention efforts was the absence of effective program coordination among the various Federal agencies. The responsible group at that time, the Interdepartmental Council to Coordinate All Federal Juvenile Delinquency Programs, lacked adequate funds, staff, and executive support. Moreover, it met infrequently and was uncertain about both its authority and responsibility.

To correct these problems, the act gave the Law Enforcement Assistance Administration (LEAA) the responsibility for overseeing all Federal juvenile delinquency activities. Specifically, it gave LEAA the statutory authority to (1) analyze, evaluate, report on, and coordinate all delinquency programs, (2) transfer funds to other agencies supporting special programs, and (3) jointly fund programs and waive conflicting administrative requirements. The act charged the Administrator of LEAA with developing objectives and priorities for all such programs and created the Office of Juvenile Justice and Delinquency Prevention (OJJDP) within LEAA to help him carry out these responsibilities. In addition, it established a Coordinating Council on Juvenile Justice and Delinquency Prevention and a National Advisory Committee for Juvenile Justice and Delinquency Prevention.

Section 204 of the act, entitled the Concentration of Federal Efforts, is a key provision. It enables LEAA to maximize its impact by focusing Federal resources on the priorities LEAA establishes. LEAA needs this kind of power because its budget for juvenile delinquency programs is small compared to what other Federal agencies spend on similar activities. In fiscal years 1977 and 1978, for example, LEAA estimated it would spend about $200 million for delinquency-related programs, while estimates of total Federal expenditures in this area have been as high as $20 billion. LEAA cannot fund the national program of juvenile justice services envisioned in the act with only $200 million. It

must mobilize other Federal resources and use existing Government dollars in support of juvenile justice priorities.

The Juvenile Justice and Delinquency Prevention Act gave LEAA indirect influence over the majority of resources needed for juvenile justice programing. Under section 204 of the act, LEAA, through OJJDP, can exert some control over other programs and shape Federal juvenile delinquency policy. It can identify duplication, inconsistencies, and gaps in Federal juvenile delinquency services. Moreover, the Associate Administrator of OJJDP can recommend to the Congress and the President changes he feels are necessary to increase the effectiveness of Federal delinquency programs. OJJDP can only fulfill its mandated program responsibilities by coordinating the other Federal programs designed to deal with various parts of the juvenile justice problem.

HISTORY OF FEDERAL INVOLVEMENT WITH THE PROBLEMS OF JUVENILE DELINQUENCY

The Federal Government has a long history of attempting to deal with juvenile delinquency. As early as 1912, with the establishment of the Children's Bureau, the Government became involved in this area. Over the next 50 years, the Federal involvement gradually increased. It was not until the 1960s and the passage of the Juvenile Delinquency and Youth Offenses Control Act of 1961 (42 U.S.C. 2541 nt) that the involvement sharply increased. This act gave the Secretary of Health, Education, and Welfare (HEW) primary responsibility for juvenile delinquency activity, and about $4[illegible] million was appropriated for fiscal years 1963-67.

Nevertheless, crime and delinquency continued to rise. As a result, the Federal resources for juvenile delinquency programs were again increased in 1968, this time through the enactment of the Juvenile Delinquency Prevention and Control Act of 1968 (42 U.S.C. 3811) and the Omnibus Crime Control and Safe Streets Act of 1968 (42 U.S.C. 3701). The Prevention and Control Act, administered by HEW, was intended to provide assistance for a wide range of services to both delinquent and predelinquent youth, and to provide national leadership in dealing with juvenile crime.

The Crime Control Act established LEAA within the Department of Justice. LEAA initially had a limited role in dealing with juvenile delinquency, but LEAA's involvement with the problem grew steadily over the next 6 years.

Juvenile delinquency eventually became one of the agency's top four national priorities.

LEAA's role in dealing with the juvenile delinquency problem was strengthened and clarified by enactment of the Juvenile Justice and Delinquency Prevention Act of 1974. The act created the Office of Juvenile Justice and Delinquency Prevention within LEAA, designating it as the focal point for juvenile delinquency activities within the Federal Government. It was also to provide, through its National Institute for Juvenile Justice and Delinquency Prevention, ongoing research into new techniques for working with juveniles and to serve as a national clearinghouse for delinquency information.

A need for coordination has long been recognized

The need for the Federal Government to coordinate its juvenile delinquency programs was recognized over 30 years ago. In 1948, the Interdepartmental Committee on Children and Youth was established to coordinate juvenile delinquency programs. However, the Committee achieved little success. The President's Committee on Juvenile Delinquency and Youth Crime, established in 1961, also failed to provide the impetus for coordinated planning.

In recent years, HEW and LEAA have been the agencies primarily responsible for preventing and controlling juvenile delinquency. The Juvenile Delinquency Prevention and Control Act, passed in 1968, made the Secretary of HEW responsible for coordinating youth-related programs and providing overall Federal leadership. HEW, however, requested only limited funding to implement the provisions of the act. Confusion over the respective roles of HEW and LEAA in dealing with delinquency contributed to problems of administration.

The Congress extended the 1968 Act for 1 year in 1971 to give HEW additional time to refocus its programs, improve its administration of the act, and coordinate its overall efforts. The amendments established the Interdepartmental Council to Coordinate All Federal Juvenile Delinquency Programs as a means to facilitate coordination. Membership on the Council included representatives from the Departments of HEW, Justice, Labor, Housing and Urban Development, Interior, Transportation, and Agriculture; the Office of Economic Opportunity; the Special Action Office for Drug Abuse Prevention; and the Office of

Management and Budget. The Attorney General was designated as chairman of the Council.

The Interdepartmental Council met a total of 20 times between 1972 and 1974, when it was preempted by the Juvenile Justice and Delinquency Prevention Act. The Council was ineffective as a coordinating mechanism due principally to the lack of adequate funds and staff and uncertainty about its authority to coordinate Federal juvenile delinquency efforts.

This lack of coordination contributed to a lack of Federal leadership to effectively combat juvenile delinquency and fragmented plans and programs at the State and local level. We highlighted these problems in a 1975 report which showed that, although estimates of the Federal involvement in the juvenile delinquency area ran as high as $12 billion, most efforts were largely uncoordinated. 1/

We also expressed the belief that if the provisions of this Juvenile Justice and Delinquency Prevention Act were properly implemented, the coordination efforts should improve.

1/ Our report, "How Federal Efforts to Coordinate Programs to Mitigate Juvenile Delinquency Proved Ineffective," (GGD-75-76, Apr. 21, 1975.)

CHAPTER 2

FEDERAL JUVENILE DELINQUENCY EFFORTS ARE STILL NOT BEING COORDINATED

The Juvenile Justice and Delinquency Prevention Act of 1974, as amended, created four mechanisms to help the Associate Administrator of OJJDP fulfill his responsibility to coordinate Federal juvenile delinquency programs:

--Evaluating and reporting authority.

--Funds transfer, joint funding, and administrative waiver authority.

--The National Advisory Committee for Juvenile Justice and Delinquency Prevention.

--The Coordinating Council on Juvenile Justice and Delinquency Prevention.

However, despite the act's strategy for coordination, Federal delinquency programs are still not coordinated. OJJDP has not used its authority to analyze, evaluate, and report on Federal programs nor has it placed a high priority on coordinating them. It has supported very few programs through interagency agreements and has never used its authority to waive conflicting administrative requirements. Finally, it has not utilized the Coordinating Council or the National Advisory Committee as the Congress intended nor given them adequate support.

Although steps could be taken to improve the operation of the mechanisms established under the Juvenile Justice Act, questions exist as to whether they can work. For example, OJJDP, because of its organizational location, may not possess the authority necessary to carry out its coordination mandate. However, since attempts to implement coordination have been limited, the extent of such problems are unknown.

COORDINATING MECHANISMS ARE NOT FUNCTIONING PROPERLY

OJJDP has not effectively evaluated and reported on delinquency programs

The act gave OJJDP responsibility for evaluating and reporting on all types of delinquency programs. OJJDP has

to prepare an annual report which must include a brief, comprehensive plan for Federal juvenile delinquency programs. The report, which is to be submitted to the President and the Congress, is supposed to cover a broad range of programs related to juvenile delinquency prevention, control, and treatment, as well as programs for neglected, abandoned, or dependent youth. OJJDP is also required to recommend administrative changes which would increase the effectiveness of these programs.

OJJDP's annual report is supposed to be based on juvenile delinquency development statements submitted by each agency which administers delinquency programs. These statements are to include an analysis of whether agency programs conform with and further the objectives and priorities set by OJJDP.

These reporting procedures are designed to give OJJDP some control over other Federal activities; however, OJJDP has not used them in Federal juvenile delinquency programs. OJJDP has published only two analysis and evaluation reports and one comprehensive plan. Moreover, it has not required agencies with delinquency-related programs to submit annual juvenile delinquency development statements.

OJJDP published the "First Analysis and Evaluation: Federal Juvenile Delinquency Programs" in September 1975. Volume I simply presented background information on the act, OJJDP, and the Federal role in delinquency prevention. Volume II listed 117 Federal programs supposedly related to juvenile justice and delinquency prevention. However, it included such seemingly unrelated programs as the School Breakfast Program and Food Stamps.

The report concluded that:

> "The Federal money spent on and around the juvenile delinquency problem in FY '75 totals somewhere between $92 million and $20 billion. There are two principal reasons for this huge discrepancy in estimates * * * programs to prevent delinquency have a very different focus than programs to respond to delinquency, and this difference interferes with comparisons of program level budget totals * * *. There are no pro-rating formulas for calculating the anti-delinquency component of an extra teacher or a free school lunch."

The report acknowledged that only a portion of the listed projects had any direct relationship to delinquency

and added that "the distorted estimates produced by aggregating program budgets will persist until project-by-project data are available."

The "Second Analysis and Evaluation: Federal Juvenile Delinquency Programs" was published in December 1976. It updated the 1975 report and identified 144 juvenile delinquency-related programs. It estimated that approximately $42 billion was spent on these programs in fiscal year 1976, but noted again that this amount was misleading because the target groups for programs included were seldom exclusively delinquents.

Volume II of the "Second Analysis and Evaluation," which was to include a detailed description of the 144 programs, experienced development delays and became so outdated that OJJDP decided not to publish it. No further analysis and evaluation reports have been issued.

Both the first and second analysis and evaluation reports have received some criticism from Federal officials because they did not identify the resources that could be used for the juvenile delinquency problem and did not facilitate the States' access to the programs. Moreover, OJJDP did not use the reports to exert any control over programs it is authorized to coordinate.

In March 1976, OJJDP published its first and only comprehensive plan for Federal juvenile delinquency programs. It contained a formal statement of Federal policy and steps for implementing various sections of the act, but it concluded that:

> "Because the delinquency issue itself is so complex and because the scope of the Federal effort is so diverse, this Plan has not attempted at this time to detail specific mechanisms for coordinating Federal programs. Future plans will speak to those issues."

The comprehensive plan failed to shape national delinquency policy. One commentator referred to the plan as "a compendium of individual decisions, future desires, and staff inventiveness." Little was done to implement the plan.

The Juvenile Justice Amendments of 1977 changed the reporting requirements for both the analysis and evaluation report and the comprehensive plan. The act now requires that the comprehensive plan be included in the analysis and

evaluation report due annually beginning December 31, 1978, thereby excusing OJJDP from preparing a report in 1977. However, as of January 1979, OJJDP had developed neither the plan nor the analysis and evaluation.

These reports are an essential step in the planning process and a potential mechanism for holding other agencies with delinquency programs accountable to OJJDP.

The OJJDP Associate Administrator agreed that they did little to evaluate and report on delinquency programs. He explained that because they had limited resources, OJJDP decided to concentrate its efforts on the deinstitutionalization of status offenders and separation of incarcerated youth from adults, issues emphasized by the Congress in the 1977 Amendments.

OJJDP has seldom used its funds transfer, joint funding, and waiver authority

A second coordination mechanism is the LEAA Administrator's funds transfer, joint funding, and waiver authority. Section 204(i) of the act assigns the Associate Administrator of OJJDP the responsibility for identifying effective delinquency prevention and rehabilitation programs and gives the Administrator of LEAA the power to support those programs through the transfer of funds appropriated under this act. In addition, section 205 of the act authorizes the LEAA Administrator to (1) designate a lead agency to act for all agencies in a jointly funded project and (2) waive any technical grant or contract requirement which is inconsistent with those of the lead agency.

One of the advantages of transferring funds through interagency agreements is that it can help insure coordinated planning and management of programs. In the process of writing an interagency agreement--an LEAA prerequisite for transferring funds in excess of $10,000--agencies must agree on the objectives of the project and how it will be administered and evaluated. Legislative barriers and problems with inconsistent or conflicting philosophy, definitions of target groups, funding requirements and guidelines become apparent as the agencies work together to develop a program.

OJJDP has cofunded several projects that illustrate the logical connections that exist among Federal delinquency-related programs. For example, OJJDP cosponsored a school crime intervention program with the Office of Education's

Teacher Corps program. OJJDP provided access to the local criminal justice systems, while the Office of Education opened channels into the school systems. This interagency agreement reflected both agencies' need to find ways to cope with the growing problem of school violence, and it showed how agencies' financial and institutional resources could be combined to support one goal.

Many Federal resources available to meet juvenile delinquency needs are in categorical programs such as alcohol and drug abuse, manpower development, and vocational education. Therefore, the potential for interagency programing is enormous. The Departments of Labor, Housing and Urban Development, and Health, Education, and Welfare all conduct programs aimed at delinquent and predelinquent youth. OJJDP has recognized that to carry out its responsibility for delinquency prevention it must rely on other agencies' programs. However, despite the large number of programs that OJJDP should coordinate, it has participated in only seven interagency agreements. Most of these were initiated by another participant in the agreement. Moreover, OJJDP has been slow to respond to proposals for interagency agreements from other agencies. For example, in June 1978, the Department of Labor submitted a proposal for seven interagency efforts with OJJDP. Six months later, however, OJJDP had responded to only one of these proposed projects.

To be sure, a number of problems are inherent in interagency transfers of funds which explain some of OJJDP's hesitancy to use interagency agreements more frequently. Agencies are held accountable for their funds. By entering into an interagency agreement, agencies feel they lose some control over the funds. They are reluctant to lose this control. Furthermore, differences in enabling legislation, program objectives, agency philosophy, congressional oversight committees, and administrative requirements make it difficult to coordinate programs closely.

The OJJDP Associate Administrator did not feel that interagency agreements were always useful or possible. He pointed out that OJJDP was criticized for transferring funds to the Teacher Corps at a time when the Congress had reduced the Teacher Corps budget. Moreover, he said that LEAA finds it difficult to justify the current level of spending when it appears that OJJDP is giving money away to other Federal programs. He also said that it is unlikely that another agency would agree to let LEAA waive the agency's technical

grant or contract requirements, even though the act gives the LEAA Administrator such authority. For that reason this authority has not been exercised. The OJJDP Associate Administrator suggested that one way to assure more interagency programs would be to legislatively require that a certain portion of each agency's funds be used for joint projects.

We also noted that OJJDP discretionary funds have not been used to jointly fund projects under the provisions of the Joint Funding Simplification Act of 1974. These funds could be pooled with those of other agencies through this mechanism.

The National Advisory Committee for Juvenile Justice and Delinquency Prevention has had difficulty meeting its goals

To ensure citizen participation in the development of juvenile justice policy, the act established the National Advisory Committee for Juvenile Justice and Delinquency Prevention. The 21 presidentially appointed members serve 4-year terms. The Committee is required to meet four times a year and to make recommendations annually to the Associate Administrator of OJJDP, the President, and the Congress. Committee advice is supposed to cover the "planning, policy, priorities, operations, and management of all Federal juvenile delinquency programs." In addition, the Committee is to assist OJJDP in preparing the annual report.

The Committee has (1) met regularly, (2) reviewed the first and second analysis and evaluation reports and the first comprehensive plan, (3) issued two annual reports with recommendations, and (4) testified at congressional hearings.

The Advisory Committee also developed contacts with State juvenile justice and delinquency prevention advisory groups. These groups were created by the act to provide for citizen participation in the development of each State's juvenile justice plan. In March 1978, the National Advisory Committee and OJJDP cosponsored a 3-day national meeting of the State advisory groups. The meeting, which drew over 250 participants, provided a forum for identifying and discussing problems the States face in implementing the act.

Members of the Committee's Concentration of Federal Efforts subcommittee attend Coordinating Council meetings, and the Advisory Committee also meets with officials of some

of the major delinquency-related Federal programs in an attempt to identify avenues for coordination. Also, in 1977, the Advisory Committee prepared a list of recommendations for strengthening the act. Many of these were incorporated in the Juvenile Justice Amendments of 1977.

However, the Committee has also had many problems. Some are inherent in establishing a new committee; others are due to poor organization and planning. The main problems were:

--Inadequate communications with OJJDP and inadequate staff support.

--Lack of direction and leadership.

--Lack of influence within the agency.

--High turnover of Committee members and delayed appointments of replacements.

Inadequate communications with OJJDP and inadequate staff support

Advisory Committee members are not regularly informed of OJJDP activities and are, therefore, unable to fulfill their responsibility to advise the Associate Administrator on aspects of OJJDP's work. The Associate Administrator said that he wanted the National Advisory Committee to tell him what to do--not ask him what it should do. But it appears the Committee is cut off from the very issues on which it is supposed to be advising.

In August 1978, OJJDP renegotiated a contract with a private contractor to provide both professional and clerical staff services for the Advisory Committee. Before that, an OJJDP employee served as the professional staff, while only the clerical work was done under contract. Neither arrangement has been satisfactory. Under the initial arrangement OJJDP did not provide full-time professional support. However, the current arrangements have, in effect, limited committee members' contact with OJJDP. Presently, they can communicate with OJJDP through the contractor's staff director, who, in turn, deals with the OJJDP project monitor; or they may contact the project monitor directly. For a period in 1978, however, the Committee and its staff did not know who the project monitor was due to a staffing change within OJJDP.

OJJDP's contract for National Advisory Committee staff support requires that the contractor keep the Advisory Committee informed of current activities and initiatives of the OJJDP and assist the Advisory Committee to advise on policy issues emerging within OJJDP. One of the duties of the Advisory Committee's staff director is to "maintain direct, continuous communication with the [Associate] Administrator of the Office of Juvenile Justice and Delinquency Prevention and/or designated personnel." These arrangements have not been effective, and committee members still feel that they need more information from OJJDP.

Lack of direction and leadership

The Associate Administrator of OJJDP encouraged the National Advisory Committee to function independently of the Office. He told the Committee that OJJDP was committed to giving them "adequate support and, basically, cutting the umbilical cord, so [it would] not be dominated by the Office." Committee independence, he explained, "means that our Office does not provide guidance to the National Advisory Committee."

The Advisory Committee, however, has not demonstrated much ability to establish its own leadership. The Committee has spent much of its time trying to decide what its role is and what it should do, even though its statutory powers and duties are outlined in the 1974 act.

Another reason for the Committee's lack of direction is that it is only one of three interrelated entities, which includes OJJDP and the Coordinating Council. Many of the Committee's functions are based on work performed by the other two bodies. But since the Coordinating Council and OJJDP are not functioning as intended, this affects the Advisory Committee. For example, it cannot assist the Office with the required annual report unless the Office takes steps to prepare it. It cannot advise the Associate Administrator on Office affairs unless it is informed of what the Office is doing. It cannot monitor the coordination of Federal programs if the Coordinating Council does not meet.

So, unable to function as the act specifies, the National Advisory Committee has attempted to redefine its role, but even here it has not been effective. One of the primary jobs it has undertaken is to support and assist the State advisory groups. Since 1976, the Committee has invited State advisory group members to participate in its meetings, has expressed concern for their youth members,

and has declared its interest in building a constituency for juvenile justice issues, using these groups as a base.

At the March 1978 meeting of the State advisory groups, however, it was evident that few felt the committee was effective in this capacity. The report of this meeting said:

> "A great deal of discussion took place on the topic of communication. Many participants felt that their views were not being made known to OJJDP and, most especially, to the NAC [National Advisory Committee]."

Lack of influence

The National Advisory Committee has not been viewed as a source of valuable advice. For instance, the Associate Administrator of OJJDP said that he was "very disappointed with a lot of the activities of the Committee in the early years." Neither the Administrator of LEAA nor the Attorney General has sought the advice of the Committee, nor have they responded to its recommendations.

Furthermore, neither the Congress nor the White House has sought National Advisory Committee advice on important juvenile justice matters. In December 1978, a Committee member expressed dismay that they were not asked to testify at the LEAA reauthorization hearings which dealt with the status of OJJDP as well. In November 1978, the Advisory Committee sent a telegram to the President in which it requested

> "the opportunity to review and comment on any legislation that affects areas for which [the National Advisory Committee] has advisory responsibility prior to the Administration taking any position. * * * As of this telegram, we have had no opportunity to provide input on these critical matters."

High turnover of committee members and delayed appointments of replacements

The first 21 appointees were given staggered terms to initiate a cycle in which one-third of the members are replaced each year. While the intentions behind that idea were good, it has in fact created a number of problems. One was that the rapid turnover in the first 3 years made it difficult for the Committee to function at a time when it

was trying to establish and define itself. Another is that much of the Advisory Committee's time has been spent educating new members.

To compound these problems even more, the appointments of replacement members have been slow. The National Advisory Committee Vice Chairman testified before a congressional subcommittee in July 1978:

> "We, the NAC, have been disappointed that our committee has been plagued with delays in the appointment of new members. 1977 saw the committee exist eight months with only 14 members, one of whom is not to be found. * * * For the past three months in 1978, the Committee has experienced the same situation."

As a result, the National Advisory Committee has functioned much of the time with either an incomplete membership or new members who were uncertain of their roles.

The Coordinating Council on Juvenile Justice and Delinquency Prevention has not functioned effectively

The Coordinating Council on Juvenile Justice and Delinquency Prevention is the fourth coordination mechanism established by the Juvenile Justice and Delinquency Prevention Act. It is an independent organization in the executive branch created to review and coordinate all Federal juvenile delinquency programs and to make recommendations annually to the Attorney General and the President.

The Council is composed of the Attorney General, who is its chairman; the Secretary of Health, Education, and Welfare; the Secretary of Labor; the Director of the Office of Drug Abuse Policy; the Commissioner of the Office of Education; the Director of ACTION; the Secretary of Housing and Urban Development; the Associate Administrator of the Office of Juvenile Justice and Delinquency Prevention who is the Vice Chairman; the Deputy Associate Administrator of the Institute for Juvenile Justice and Delinquency Prevention and representatives of other agencies designated by the President. The act allows agency heads to designate Council membership to other officials, but specifies that such designees must "exercise significant decisionmaking authority" within their own agencies.

The Council is required to meet four times a year and to include a description of its activities in the annual analysis and evaluation report. The Juvenile Justice Amendments of

1977 specifically gave the Council the authority to determine if the programs and practices of Federal agencies are consistent with two important objectives of the act: (1) section 223 (a)(12)(A) on the deinstitutionalization of status offenders and nonoffenders and (2) section 223(a)(13) on the separation of juveniles and adults in institutions.

The Coordinating Council is an integral part of the Congress' plan to improve Federal coordination. Working in tandem with the National Advisory Committee and OJJDP, the Council was intended to be one of the major mechanisms for coordination. Of the three, the Coordinating Council is the most logical entity to initiate changes in legislation, regulations, policy directives, planning guidelines, and evaluation designs to draw attention to juvenile justice priorities. Council members have both the Federal perspective and the power to make changes at that level.

In fact, however, the Council has been incapable of coordinating Federal juvenile delinquency policy because of (1) infrequent meetings, (2) inadequate staff support, and (3) unclear direction from LEAA. An OJJDP discussion paper on the Council concluded that, "The Council has not been given the political, executive, administrative, organizational or resource support necessary to coordinate national juvenile delinquency programs." Similarly, in its second annual report, the National Advisory Committee noted problems with the Coordinating Council, citing reasons such as inadequate staffing, lack of participation by policymaking officials, and the absence of enforceable policy guidelines. The results are clear: the Council has neither fulfilled its mandated responsibilities nor functioned as intended by the Congress.

Infrequent meetings

As noted above, the Council has not met regularly. Between April 1975 and December 1976, the Council met a total of eight times. At that point, with the election of a new President and the resignation of top officials in all departments, the Council stopped meeting. Further meetings were not held pending the appointment of new Administration officials. Delays were also attributed to a lack of support within the Department of Justice.

After some delay in assuring participation by the new Attorney General, OJJDP finally convened the Coordinating Council on August 24, 1978. It had been 18 months since its last meeting. By this time the entire membership

of the Council had changed. The Associate Administrator of OJJDP, who chaired the meeting after the Attorney General's opening remarks, called it an orientation session. He explained that the Council needed to refocus its efforts toward the issues cited by the Congress in 1977--deinstitutionalization of status offenders and nonoffenders and the separation of juveniles and adults in institutions.

The next three meetings of the Council were held on December 18-20, 1978, which, according to OJJDP, fulfills the statutory requirement that the Council meet four times each year. OJJDP spent a lot of time at these meetings explaining the Council's purpose and why the participants' programs should be coordinated. The OJJDP Associate Administrator believed this orientation was an important step in avoiding the failures of past coordination attempts.

Inadequate staff support and unclear direction

Although OJJDP has tried several approaches to provide staff support for the Coordinating Council, none has been sufficient. OJJDP employees have been responsible for planning Council meetings, developing agendas, and providing backup information, but most of this support has been provided by only one OJJDP employee who has also been responsible for the National Advisory Committee, interagency agreements, and the annual reports.

The Associate Administrator explained that his office was understaffed, and it was difficult to detail even one person to the Coordinating Council. However, it should be noted that for more than a year OJJDP had approximately 10 vacant positions which were subsequently abolished as a result of a personnel reduction. The Associate Administrator said that he had been unable to fill these positions because LEAA had not supported his efforts to develop new position descriptions and advertise for new jobs.

OJJDP attempts to get support staff from member agencies have been unsuccessful. In 1976, and again in 1978, OJJDP requested that member agencies detail staff to the Coordinating Council to prepare agendas and to follow up on issues raised at the meetings. To date, however, no member agencies have provided any such support.

In another attempt to provide staff, OJJDP arranged for an Executive Secretary for the Coordinating Council who served for about 1 year. Under its Visiting Fellowship

Program, LEAA also gave a 15-month grant to a juvenile justice expert who planned to act as a participant observer and chronicler for the Council. The results of his study were to be incorporated into written recommendations for the Council's consideration and were to serve as a basis for policy development. However, during the entire time that the Executive Secretary and the Visiting Fellow were on contract the Council did not meet.

OJJDP also tried to fill the need for full-time support staff through arrangements with private contractors. These efforts resulted in various products, including a paper on Federal juvenile delinquency policy alternatives, a budget analysis and program inventory, and a demonstration project designed to pull together multiagency funding for local juvenile justice programs and to identify obstacles to joint funding.

But here, too, there were problems. The Council monitored the progress of these contracts through briefing sessions, but members had little impact on project design or implementation. Furthermore, the Council was never told how it could best coordinate with these projects or fully utilize the results of the contractors' work.

Moreover, while the budget analyses and program inventory fulfilled OJJDP's reporting requirements, there is no indication that Federal agencies have improved their coordination as a result. Similarly, although the policy alternatives paper identified 11 research priorities, neither the National Advisory Committee nor the Coordinating Council felt it could represent Federal policy. Finally, the demonstration project on multiagency funding was terminated by OJJDP in the fall of 1977. Its final report summed up the problems other contract agents have faced:

> "* * * it was our plan to focus Federal Coordinating Council attention on actual demonstrations of 'CFE' [Concentration of Federal Efforts] at the local/state level, so that Council members could appreciate the CFE obstacles their agencies had the power to remove, and could begin the work of removing them. * * * The Coordinating Council was not sufficiently organized or staffed to respond as planned at the national level."

CAN THESE COORDINATION MECHANISMS WORK?

Although there are steps which OJJDP could take to improve the operation of the mechanisms established under the Juvenile Justice and Delinquency Prevention Act, there are legitimate reasons to question whether they can work.

For example, although charged with coordinating the Federal juvenile delinquency effort, because of its organizational location OJJDP may not possess the authority necessary to carry out this mandate. The LEAA Administrator is required to implement overall policy and development objectives and priorities for all Federal juvenile delinquency programs and activities. However, as he has no authority over the secretaries and agency heads whose programs he is expected to influence, he has no real power to enforce his policies or priorities.

The Coordinating Council was established as an independent entity to coordinate all Federal juvenile delinquency programs. However, since staff support for the Council is dependent upon the discretion of the OJJDP Associate Administrator, much of the independence originally intended for the Coordinating Council has been compromised.

There are good reasons to reexamine some of the mechanisms established under the act. A different organization at a higher level of authority, for example, may be a better means of establishing true interagency coordination. It has also been suggested that the addition of an Office of Management and Budget representative to the Coordinating Council might strengthen that body. However, since attempts to implement coordination have been limited, the question cannot yet be answered.

CONCLUSIONS

The mechanisms established under the Juvenile Justice and Delinquency Prevention Act to coordinate Federal juvenile delinquency programs have not been effectively implemented by LEAA. Reports and plans prepared by OJJDP have not been timely, nor have they adequately identified available resources or facilitated State access to the programs.

Joint projects could be valuable instruments for developing interagency contacts and consistent Federal policies. However, OJJDP has done little to encourage their development. The few joint projects that have been

established have primarily been the result of initiatives by other Federal agencies.

Neither the National Advisory Committee nor the Coordinating Council has functioned as intended by the act. Both bodies have been hampered by inadequate direction and support provided by LEAA. The Committee has not been afforded an adequate communication channel with OJJDP and has not been given the opportunity to provide advice as originally envisioned. The Coordinating Council has met only sporadically and has not been provided staff to function independently as the act intended.

LEAA must be held accountable for many of the coordination problems since 1974, but problems with the mechanisms themselves should also be considered. For example:

--Although charged with coordinating the Federal juvenile delinquency effort, OJJDP does not possess the authority necessary to carry out this mandate.

--Although the LEAA Administrator is required to implement overall policy and develop objectives and priorities for all Federal juvenile delinquency programs and activities, he has no authority over the secretaries and agency heads whose programs he is expected to influence.

We believe there are legitimate reasons to question whether LEAA possesses authority commensurate with its responsibility to carry out effective Government-wide coordination of juvenile delinquency programs. However, since attempts to implement coordination have been limited, the question cannot yet be answered.

RECOMMENDATIONS TO THE ATTORNEY GENERAL

The Attorney General should require LEAA to assume the Federal leadership role that was expected of it when the Juvenile Justice and Delinquency Prevention Act of 1974 was passed. LEAA should thoroughly catalog the overall Federal effort to provide a meaningful basis for coordination and should encourage additional interagency projects dealing with key youth issues. LEAA should also provide both the National Advisory Committee and Coodinating Council with the direction and resources necessary for them to carry out their mandated responsibilities.

RECOMMENDATIONS TO THE DIRECTOR, OFFICE OF MANAGEMENT AND BUDGET

There is a legitimate question as to whether LEAA can achieve coordination despite renewed coordination efforts. LEAA is located at a low level within the bureaucracy and may not be able to successfully carry out its responsibilities. But, since coordination attempts to date have been limited, the extent of this problem is unknown.

We recommend that the Director, Office of Management and Budget, closely monitor the implementation of existing coordination activities within LEAA and OJJDP and between them and the National Advisory Committee and the interdepartmental Coordinating Council. We also recommend that the Director form a working committee, chaired by Office of Management and Budget and consisting of senior staff from that Office with responsibilities for Federal agencies involved in juvenile justice and delinquency prevention and related areas, as well as representatives from those agencies. This group should (1) assess the limits and opportunities available under present coordination mechanisms authorized, and (2) consider the feasibility of establishing an interdepartmental working group at a staff level comprised of those agencies currently represented on the Coordinating Council to plan joint ventures; establish procedures for coordination, communication, and information sharing; and pool research, evaluation, and technical assistance resources to improve Federal and federally supported juvenile justice and delinquency prevention efforts.

AGENCY COMMENTS

The Department of Justice and the Office of Management and Budget commented on a draft of this report by letters dated July 6, 1979, and May 30, 1979, respectively. (See app. 1.)

The Department of Justice agreed with our assessment that the coordination mechanisms established by the Juvenile Justice and Delinquency Prevention Act have not been adequately implemented by OJJDP. It stated that although the effectiveness of the mechanisms could not be fairly tested, it believed that LEAA had ample authority to carry them out.

The Department also informed us of modifications to the Juvenile Justice Act that it was considering to improve the efficacy of existing coordination mechanisms, and of several positive actions that were taken since our fieldwork was completed. It stated that OJJDP had completed negotiations on two interagency programs which are awaiting approval, and

that a third interagency program is being developed in concert with the White House Interagency Task Force on Youth.

The Office of Management and Budget stated that the Administration has been concerned about OJJDP's role in coordinating juvenile delinquency programs, and that it was well aware of the criticisms of OJJDP and the Coordinating Council on Juvenile Justice and Delinquency Prevention. The Office told us of actions being taken by an Interagency Working Group on Youth which held its first meeting on March 21, 1979. The Office said that their efforts would respond to the recommendations suggested in this report.

The Office of Management and Budget concluded its comments by stating that the Administration was committed to improving coordination, and hoped that the results of this commitment would be evident in the near future.

CHAPTER 3

THE NEED FOR INFORMATION ON JUVENILE JUSTICE ACTIVITIES STILL HAS NOT BEEN MET

During the hearings leading to the passage of the Juvenile Justice and Delinquency Prevention Act of 1974, the Congress recognized the need for a clearinghouse to dispense information about juvenile delinquency and to enhance coordination. Without such a clearinghouse, there was concern that the results of programs, especially State or local programs, might not get the attention they deserve. Moreover, a clearinghouse would give prospective grantees a central place to obtain comprehensive information about the Federal resources for coping with juvenile delinquency.

As a result of such considerations, the Juvenile Justice and Delinquency Prevention Act of 1974 authorized the establishment of an informational clearinghouse to disseminate information related to juvenile delinquency, and the National Institute of Juvenile Justice and Delinquency Prevention, an office within OJJDP, was given the responsibility of setting up and administering the clearinghouse. The act authorized the Institute to serve as an information bank for all aspects of juvenile delinquency, including prevention and treatment. Its extremely broad responsibilities were the collection, synthesis, preparation, publication, and dissemination of data from almost any source, and it was to coordinate its activities with existing services.

Our review showed that although a need still exists, the mandate to develop an informational clearinghouse has not been fulfilled. We also found that current plans to develop a clearinghouse had not considered the possibility of meeting the need by expanding those already in existence.

A NEED EXISTS FOR JUVENILE JUSTICE INFORMATION

We discussed informational needs with several State and local juvenile justice practitioners and attended two conferences of State juvenile justice representatives. In nearly every case there was dissatisfaction with the information currently available.

During a national meeting of State juvenile justice advisory groups, for example, several participants felt they needed to know more about what other States and

localities are doing. Often a practitioner will hear about a State program that interests him, but will not know how to get additional information. As a result, one participant stated there is a real need to establish a mechanism to provide an exchange of information.

In addition to wanting to know what is occurring in other States, several juvenile justice practitioners identified more specific needs. A juvenile justice specialist at one State planning agency expressed a need for evaluations, data on successful programs, and guidelines on how to use the data. A representative from another State planning agency wanted to know more about what is happening at the Federal level regarding juvenile justice matters. Other practitioners are interested in residential and community-based facilities, and guidelines on how to implement successful projects. In general, they believe the juvenile justice related information is received after it is needed or is too general to be very useful.

In addition to State representatives, we talked to several local practitioners who were interested in receiving statistical information and data on children in institutions, runaways, and alternatives to the juvenile justice system. In identifying his need, a consultant stated that practitioners generally do not know where to go or how to get information.

OJJDP HAS NOT YET FULFILLED ITS CLEARINGHOUSE MANDATE

In order to meet its clearinghouse responsibilities, OJJDP began an assessment center program in November 1976. The objectives of this program, a planned 42-month, $5.3-million effort, were to gather, synthesize, and reorganize knowledge about juvenile justice into general topic areas. Organizationally, the program consisted of three topical centers and a coordinating center.

The topical centers dealt with the juvenile justice system, alternatives to juvenile justice processing, and the prevention of delinquent behavior. Each was to gather and assess information in its particular topic area, synthesize it, identify knowledge gaps, and publish reports for dissemination.

The coordination assessment center is responsible for assisting and coordinating the efforts of the other centers. It is also responsible for editing their reports and preparing a comprehensive annual report summarizing knowledge in the

juvenile justice field. The audience for these publications is to be practitioners in the field, legislators, and decisionmakers.

Phase I of the assessment center program was originally planned to last about 17 months. However, this phase actually lasted about 26 months, running through December 31, 1978. During phase I, the centers identified information sources, analyzed, and summarized juvenile delinquency information in selected areas. Each center then drafted reports on various subjects, such as the status offender. In addition, the coordinating center drafted its comprehensive report. However, none of these reports have been finalized and published.

But publishing its reports has not been the program's only problem. An analysis conducted by LEAA's Office of Planning and Management in April 1978 identified serious management problems in the program, including unclear lines of authority, substantial schedule delays, and problems in overall coordination. It also noted that the assessment center program had not fulfilled its clearinghouse function.

To correct these problems, the report recommended, among other things, that another mechanism for coordination be established and that other management improvements be made. The Office of Planning and Management felt, however, that the program should be continued.

About the same time the assessment center program was being reviewed by LEAA, the National Council on Crime and Delinquency was preparing a report outlining a design for OJJDP's juvenile justice information system and clearinghouse. However, OJJDP's National Institute of Juvenile Justice and Delinquency Prevention subsequently decided that the Council's design was too costly. Instead, the Institute was devising its own plans for the clearinghouse, projecting a cost of $1.6 million for the first year.

Basically, the clearinghouse is now envisioned as a central contact point for juvenile justice practitioners. Plans are to establish a panel which practitioners would be able to contact directly for information. If the information is not readily available, the clearinghouse may have to repackage existing reports for particular audiences, have a report prepared on that subject, or refer the requestor to another source.

In general, as envisioned, the clearinghouse will identify practitioners' information needs, collect information, repackage reports, and disseminate information.

In addition to OJJDP's assessment center efforts, the office undertook several other projects related to its clearinghouse responsibility. An early one was a respondents' panel composed of representatives from various segments of the juvenile justice system. Established in June 1976, it was to identify current issues and trends in juvenile justice at the State and local levels and was also expected to develop data about systems' operations. Representatives from each State were selected to identify important issues in their States, the results of which were reported in April 1977. A total of 28 major issues and 170 subheadings were identified and ranked. However, this effort was abandoned because according to an OJJDP official, there is not enough data in the field to reliably predict trends.

Other information mechanisms used by OJJDP include a newsletter, publications, conferences, training, technical assistance, special emphasis projects, and use of other LEAA services, such as its mailing list. In fact, OJJDP is required by LEAA to develop a mailing list category for inclusion on the LEAA list. However, as of November 21, 1978, no such list had been established. The reason, according to an official in the Office of Juvenile Justice and Delinquency Prevention, is that no one has been told to provide it.

CURRENT CLEARINGHOUSE NEEDED TO BE REASSESSED

OJJDP had plans to develop its own information clearinghouse and expenditures of about $1.6 million were planned to design the initial clearinghouse method. However, since other offices and organizations are already involved in information dissemination, it was questionable whether another clearinghouse was really the answer.

For example, the National Criminal Justice Reference Service already collects, publishes, and disseminates juvenile justice data and is currently expanding its services in this area. Close coordination between OJJDP and the Reference Service would be beneficial, especially since the hearings and the act emphasize that OJJDP should coordinate its efforts with existing services.

We talked with several persons concerned with information system operation and development. They agreed that an

expanded Reference Service clearinghouse is feasible and advised us that many of the features envisioned for the OJJDP clearinghouse could be incorporated into the Reference Service system for less than it would cost to establish a new clearinghouse.

Although agreeing with the feasibility of this approach, OJJDP's Deputy Associate Administrator expressed several concerns. He felt that the Reference Service has never performed the type of comprehensive dissemination function called for in the Juvenile Justice and Delinquency Prevention Act of 1974. Another expressed OJJDP concern involved uncertainty over the amount of control OJJDP would have over the clearinghouse if the function were performed by another group. Also, there is concern that youth issues may not receive the priority necessary to develop and maintain the envisioned clearinghouse operations.

While we agree these are valid concerns, development of a single, comprehensive LEAA information clearinghouse needed to be explored.

CONCLUSIONS

In response to the continuing informational needs of juvenile justice practitioners, in 1974 the Congress authorized the National Institute of Juvenile Justice and Delinquency Prevention to serve as a national center and clearinghouse for information about juvenile delinquency. Although not specifying how the clearinghouse was to be established, the Congress recognized the potential for duplication with other agencies.

While several projects related to the dissemination function have been attempted, OJJDP has not yet fulfilled its clearinghouse mandate. Practitioners throughout the Nation still need information.

Moreover, although the Institute recognizes its responsibility to better answer the informational needs of juvenile justice practitioners, it had not adequately explored the possibility of fulfilling its role through existing clearinghouse services at the time of our review.

We propose that the Attorney General direct LEAA to explore the feasibility of meeting its clearinghouse

responsibilities through existing organizations before a separate informational clearinghouse on juvenile justice is established.

AGENCY COMMENTS

The Department of Justice agreed that the mandate to develop an informational clearinghouse has not been fulfilled, but believed that we should have given recognition to constraints, such as staffing limitations and a recognition of OJJDP in 1978. The Department identified actions it took to deal with those problems. (See app. I.)

The Department disagreed with our statement that current plans to develop a clearinghouse had not taken into consideration the possibility of meeting the need by expanding those already in existence. The Department explained its position by stating that LEAA recognized the continuing need to expand its acquisition and distribution services, as well as the need for a separate search, retrieval, and referral service that would enable OJJDP to meet those needs not met by the National Criminal Justice Research Service.

It is this separate service that we were concerned about. However, the Department's actions, as discussed in its comments, have taken care of the concerns expressed in our proposal.

CHAPTER 4

SCOPE OF REVIEW

We reviewed LEAA efforts to implement the coordination and information dissemination provisions of the Juvenile Justice and Delinquency Prevention Act of 1974. Specifically, our purpose was to

--determine what LEAA has done or plans to do to coordinate Federal juvenile delinquency programs, and

--ascertain how LEAA intends to establish a juvenile delinquency information clearinghouse.

Our review was designed primarily as a followup to previous work done by us before enactment of the 1974 act.

We conducted the review primarily at LEAA headquarters in Washington, D.C. We interviewed officials and examined numerous reports and documents concerning program coordination and information dissemination issues. We also interviewed officials from other Federal agencies, including the Departments of HEW, Labor, and Justice, and the Office of Management and Budget. In addition, we held discussions with a number of practitioners representing various segments of the State and local juvenile justice system, as well as several representatives from the private sector.

UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

Address Reply to the
Division Indicated
and Refer to Initials and Number

JUL 20 1979

Allen R. Voss
Director
General Government Division
United States General Accounting Office
Washington, D.C. 20548

Dear Mr. Voss:

This letter is in response to your request for comments on the draft report entitled "Federal Juvenile Delinquency-Related Activities: Coordination And Information Dissemination Are Lacking."

The Department of Justice (DOJ) agrees with the General Accounting Office's (GAO) assessment that the coordination mechanisms established by the Juvenile Justice and Delinquency Prevention (JJDP) Act have not been adequately implemented by the Office of Juvenile Justice and Delinquency Prevention (OJJDP) to test fairly their effectiveness. Related to this matter, references are made throughout the report of LEAA's "lack of authority" to carry out its coordination mandate. We believe ample authority exists in the Act. Coordination efforts have been hindered more by other factors than by any lack of statutory authority.

Currently, DOJ is considering modifications to the JJDP Act that are designed to improve the efficacy of existing coordination mechanisms. These proposed amendments include: (1) earmarking five percent of the JJDP Act appropriation for interagency programs, (2) authorizing the Coordinating Council on Juvenile Justice and Delinquency Prevention (Coordinating Council) to review and make recommendations

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on all such joint funding efforts, (3) designating staff support for the Coordinating Council, (4) authorizing the Attorney General to delegate his authority as Chairman to the head of OJJDP, and (5) requiring at least two of every seven new members of the National Advisory Committee for Juvenile Justice and Delinquency Prevention (National Advisory Committee) be appointed from current members of state advisory groups. These legislative revisions, coupled with more effective direction and support from OJJDP, should improve the utility of these mechanisms in coordinating Federal juvenile delinquency programs.

The report states that coordinating mechanisms are not functioning properly. This was true at the time GAO was completing its field work, but LEAA has taken several positive actions since then. For example, OJJDP has completed negotiations with the Department of Health, Education, and Welfare (DHEW) and the U.S. Marshals Service (USMS) regarding two interagency programs which are awaiting approval. A third interagency program is currently being developed in concert with the White House Interagency Task Force on Youth. This program represents a coordinated effort that enlisted the support and cooperation of the Departments of Labor, Agriculture, and HEW. This interagency coordination will evolve into a National Interdisciplinary Corporation with LEAA having the lead agency responsibility.

LEAA is also trying to broaden its interagency involvement through implementation of the National School Resource Center (NSRC), an element of the Special Emphasis Prevention of School Crime Program. This program's goal is to develop a national resource network to provide assistance to schools, teachers, parents, students and other school-related personnel on a nationwide basis. While the NSRC will be funded primarily by LEAA, it is the partial result of the three year coordinative effort between OJJDP and the DHEW Office of Education. The NSRC will be very closely coordinated with the Office of Education's program efforts in those school districts involved with the program. The Office of Education's involvement will be vital to OJJDP and project personnel as a means of gaining access to the school districts.

DOJ disagrees with GAO's statement that OJJDP hired a private contractor in August 1978 to provide both professional and clerical staff services to the National Advisory Committee.[1] This was the date an existing contract, originally let in April 1975, was renegotiated to provide staff support to the National Advisory Committee. Specifically, the contract provides for adequate professional and clerical support to the National Advisory Committee for scheduling meetings, developing agendas, recording minutes, disseminating information, and communicating with the National Advisory Committee membership. It should also be noted that the National Advisory Committee chairperson has had direct access to the Administrator, OJJDP. In addition, the Deputy Associate Administrator, OJJDP, who is the Director of the National Institute for Juvenile Justice and Delinquency Prevention (Institute), reports routinely to the National Advisory Committee's Sub-Committee. In view of the shortage of personnel in OJJDP, it is DOJ's position that the assignment of one position from OJJDP, assisted by the support contract, is sufficient staffing to coordinate OJJDP involvement with the National Advisory Committee.

A new contract for provision of support services to the National Advisory Committee is being developed to replace the renegotiated contract. An ad hoc committee, appointed by the National Advisory Committee chairman, has been involved with the OJJDP in the development of an appropriate scope of work for the new contract. OJJDP envisions a closer working relationship with the National Advisory Committee and its subcommittees in the future.

We concur with the finding relating to the Coordinating Council and clearly acknowledge that we have been unable, with the current staffing level, to provide adequate staff to support its prerequisite functions. A recent assessment of the workload in the OJJDP indicated that, at a minimum, two persons working full time are required to carry out LEAA's portion of the Coordinating Council's responsibilities. To date only one person, on a part time basis, has been given the responsibilities associated with the Coordinating Council. We recognize that with appropriate staff and additional resources, some of the problems can be resolved. To this end, OJJDP is also considering the inclusion of program funding in each OJJDP division to support Coordinating Council functions.

[1]/Report has been revised to recognize this comment.

DOJ agrees that "the mandate to develop an informational clearinghouse has not been fulfilled," but GAO did not acknowledge either the burgeoning process or the continuous constraints that OJJDP's Institute has experienced. The staffing level of the Institute represents about one-fourth the number of permanent staff per dollar allocation currently assigned to the Institute's companion organizations--the National Institute of Law Enforcement and Criminal Justice, and the National Institute of Corrections--both of which have legislative mandates quite similar to those of the Institute.

Furthermore, in 1978, the OJJDP was reorganized, which resulted in the loss of the Institute's Training and Information Dissemination Division. LEAA is currently seeking to re-establish it through reorganization of OJJDP.

Since the Institute is operating at reduced funding and staffing levels, a strategy of incremental growth is being adopted in order to accomplish its legislative mandates in a logical sequence--concentrating first on generation, collection, assessment, and synthesis of prior and current knowledge of juvenile delinquency and second, on dissemination of useful information to the field.

Thus, beginning in 1975, the Institute undertook a broad program of research, evaluation, assessments and standards development work. Then, in 1976 the Assessment Centers Program was launched with a mandate to comprehensively collect, assess synthesize, and prepare for publication information on major aspects of delinquency. Phase I of this work recently ended, resulting in about 40 reports which are now being prepared for publication. While this work was more difficult than expected, due mainly to the paucity of reliable data and qualitative results, the assessment centers are now aware of their tasks--collection, assessment, synthesis, and preparation of reports for dissemination. Phase II is being accelerated. Dissemination work can now be intensified through the establishment of the OJJDP Clearinghouse and the Training Center mandated to the Institute.

The draft report states that "current plans to develop a clearinghouse have not taken into consideration the possibility of meeting the need by expanding those already in existence." This is not correct. LEAA never considered establishing separate document acquisition and mass distribution services from those maintained by the National Criminal Justice Research Service (NCJRS). What LEAA has recognized is the continuing need to expand its acquisition and distribution services, as well as the need for a separate search, retrieval, and referral service that would enable the OJJDP to meet the specific needs of the juvenile field which NCJRS has not met adequately. It was always intended that such a service, if established separately, would be closely coordinated with NCJRS's acquisition and distribution services. At LEAA's last meeting with the GAO staff, the assessment of NCJRS's capabilities to meet the specific OJJDP needs had been started but not completed. At that point, LEAA was unable to determine optimum OJJDP clearinghouse needs to adequately service the information needs of the juvenile field. Since that time, an assessment of NCJRS's potential capability for meeting the current needs of those working in the delinquency area has been completed and that potential appears very promising.

GAO also refers to an analysis conducted by LEAA's Office of Planning and Management which noted that the Assessment Centers Program experienced a number of operational problems. These problems have been corrected except the need for an improved coordination mechanism. We are currently attempting to overcome this deficiency either through securing additional staff for the Institute's Training and Dissemination Division (the preferred approach), through the clearinghouse mechanism, or through an evaluation of the overall program.

The report also states that LEAA's Office of Planning and Management report concluded "the Assessment Centers Program had not fulfilled its clearinghouse function." This conclusion represents a misunderstanding of the purpose of the program. The assessment centers were never intended to serve as clearinghouses. Their tasks were limited to collection, assessment, synthesis, and preparation of reports for dissemination. As noted above, until such time as OJJDP established a clearinghouse mechanism, NCJRS was to serve as the primary dissemination mechanism for information on

delinquency. LEAA always intended to establish a mechanism separate from the assessment centers for the dissemination function.

GAO concludes that "OJJDP plans to develop its own information clearinghouse and expenditures of about $1.6 million are planned to design the initial clearinghouse method." This is not entirely true. LEAA is currently exploring the possibility of expanding NCJRS's search, retrieval, and referral services rather than establishing a separate service of this type. As a consequence of recent meetings with the National Institute of Law Enforcement and Criminal Justice (NILECJ) and the NCJRS staff, and a site inspection of NCJRS operations, LEAA believes that it is feasible to expand NCJRS activities in the above areas to perform the kinds of services described in the draft report, and more generally, expand its retrieval and distribution services in order to meet the needs of the delinquency field. An agreement to accomplish these tasks will require first year costs of approximately $300,000, to achieve a minimal level of start-up services.

The report implies that the work performed by the National Council on Crime and Delinquency (NCCD) has not been utilized by the Institute. The Institute is making use of the clearinghouse design developed by NCCD in its planning work both with respect to designing the clearinghouse and improving in the Assessment Centers Program.

GAO's final recommendation suggests "that the Attorney General direct LEAA to explore the feasibility of meeting his clearinghouse responsibilities through existing organizations before a separate informational clearinghouse on juvenile justice is established." This is being done. As noted above, we are currently in the process of concluding arrangements under which we would attempt to meet our clearinghouse responsibilities through expansion of NCJRS's operations rather than establishing a separate informational clearinghouse.

As for OJJDP's evaluation and reporting responsibility, DOJ agrees that the annual reports issued thus far by the LEAA have been of little value in providing a comprehensive picture of the juvenile delinquency effort. The 1978 analysis and evaluation report will be an improvement over prior

reports and will include a comprehensive plan for coordination of all juvenile delinquency prevention programs. It is scheduled for release approximately October 31, 1979.

Finally, DOJ agrees that the Office of Management and Budget (OMB) could play a valuable coordination role for Federal juvenile justice and delinquency programs. OMB has the leadership capability necessary to assure that interactions among Federal agencies having juvenile programs are ongoing in order to provide the coordination required by congressional mandate. OMB could serve as a catalyst in the formulation of a working committee that would bring together, on a regular basis, staff level representatives of agencies administering junvenile programs to ensure continued dialogue among them. The working committee could make recommendations for juvenile justice improvements to both the National Advisory Committee and the Coordinating Council.

Both the National Advisory Committee and the Coordinating Council have not had the communication and discussion that is necessary to coordinate the wide array of Federal juvenile programs. The National Advisory Committee, consisting of juvenile justice experts and community leaders, serves to advise OJJDP, the President, and the Congress on planning, policies, priorities, operations and management of Federal juvenile justice efforts. The National Advisory Committee meets only four times a year, and is unable to fully provide coordination assistance necessary for ongoing operations.

The Coordinating Council, whose membership consists of Federal department and agency heads whose organizations administer juvenile programs and other agency heads designed by the President, does not presently extend membership to OMB. Consideration might be given to including the Director of OMB or a selected designate as a permanent member on the Coordinating Council. If the Coordinating Council is to advise and make recommendations to OJJDP, the President, and Congress on coordination matters, then OMB seems to be the missing link necessary to bring all Federal juvenile justice and delinquency prevention programs together.

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We appreciate the opportunity to comment on the report. Should you desire any additional information, please feel free to contact us.

Sincerely,

for Wm. D. Van Haren, acting

Kevin D. Rooney
Assistant Attorney General
for Administration

APPENDIX I

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

MAY 30 1979

Mr. Allen R. Voss
Director
General Government Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Voss:

The Director asked that I respond to your request for comments on your draft report entitled, "Federal Juvenile Delinquency - Related Activities: Coordination and Information Dissemination Are Lacking."

The Administration has been concerned about the Office of Juvenile Justice and Delinquency Prevention's (OJJDP) role in coordinating juvenile delinquency programs. We are well aware of the criticisms of OJJDP and of the Coordinating Council on Juvenile Justice and Delinquency Prevention. Partly because of the Administration's concern about the lack of coordination among Federal agencies that have funds for troubled young people, the White House established an Interagency Working Group on Youth which held its first meeting on March 21, 1979, and has had three subsequent meetings. The group includes officials from the Law Enforcement Assistance Administration, the Department of Agriculture, the Department of Health, Education and Welfare, and the Department of Labor, and is chaired by the Office of Management and Budget and the White House Office of Intergovernmental Affairs.

This group is reviewing (1) program policy guidelines and regulations in view of promoting more effective linkages among local youth services, (2) management improvement/capacity building and the promotion of integrated youth services at the local level, and (3) the adequacy of coordination of youth-related research, development and evaluation activities. Although the Working Group's scope is broader than juvenile delinquency programs, it will address these programs in all of its reviews. The efforts

of this group respond to the recommendations you suggest on pages 31-32.

As you pointed out in your draft, there are questions about whether the coordinating mechanisms established under the Juvenile Justice and Delinquency Prevention Act can work. Our contention is that the provisions in the Act are essentially sound but have not been vigorously implemented. However, several amendments to the Act are being proposed by the Administration in order to strengthen the coordinating mechanisms. We have proposed that the Federal Coordinating Council be authorized to review and make recommendations on all joint funding efforts proposed between OJJDP and member agencies of the Coordinating Council and that the appointment of a staff director, an assistant staff director, and needed support staff be made mandatory. We are also proposing that two of every seven new members on the National Advisory Committee for Juvenile Justice and Delinquency Prevention be appointed from current members of State advisory groups.

Ultimately, no coordinating mechanisms can work if the personal commitment of responsible officials is lacking. This Administration's officials do have that commitment. We hope that the results of that commitment will be evident in the near future.

Thank you for giving us this opportunity to comment on your draft.

Sincerely,

Franklin D. Raines
Associate Director
Economics and Government

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